

1 Rena Andoh (admitted *pro hac vice*)
2 randoh@sheppardmullin.com.com
3 **SHEPPARD, MULLIN, RICHTER &**
4 **HAMPTON LLP**

30 Rockefeller Plaza
New York, NY 10112
Telephone: (212) 653-8700
Facsimile: (212) 653-8701

6 Lai L. Yip (SBN 258029)
7 lyip@sheppardmullin.com
8 Four Embarcadero Center, 17th Floor
9 San Francisco, CA 94111
10 Telephone: (415) 434-9100
11 Facsimile: (415) 434-3947

12 Travis J. Anderson (SBN 265540)
13 tanderson@sheppardmullin.com
14 12275 El Camino Real, Suite 100
15 San Diego, CA 92130
16 Telephone: (858) 720-8900
17 Facsimile: (858) 509-3691

18 Kazim A. Naqvi (SBN 300438)
19 knaqvi@sheppardmullin.com
20 1901 Avenue of the Stars, Suite 1600
21 Los Angeles, CA 90067
22 Telephone: (310) 228-3700
23 Facsimile: (310) 228-3701

24 Attorneys for Plaintiff and
25 Counterdefendant Moog Inc.

26 **UNITED STATES DISTRICT COURT**
27 **CENTRAL DISTRICT OF CALIFORNIA**

28 MOOG INC.,

Plaintiff,

v.

SKYRYSE, INC., ROBERT
ALIN PILKINGTON, MISOOK
KIM, and DOES NOS. 1-50,

Defendants.

Case No. 2:22-cv-09094-GW-MAR

Hon. George H. Wu

**[PROPOSED] ORDER GRANTING
PLAINTIFF MOOG INC.'S MOTION
TO ENFORCE COMPLIANCE WITH
THE COURT'S ORDERS (DKTS. 25,
109 253, 272, 292), AND FOR
MONETARY SANCTIONS FOR
CONTEMPT**

1 The Court, having considered Moog, Inc.’s (“Moog”) Motion To Enforce the
2 Court’s Orders (Dkts. 25, 109, 253, 272, 292) and for Monetary Sanctions for
3 Contempt (the “Motion”), along with other documents in support of and in
4 opposition to the Motion, being fully advised in the matter, and good cause
5 appearing, hereby **ORDERS THAT**:

- 6 1. Moog’s Motion is GRANTED;
- 7 2. Within 7 days of the Court’s order, the Individual Defendants shall
8 produce all communications between March 7, 2019 through December
9 31, 2020 from five electronic devices produced to discovery vendor
10 iDiscovery Solutions, Device Nos. 0003, 0004, 0014, 0021, and 0022;
11 and
- 12 3. Monetary sanctions for reasonable attorneys’ fees and costs in the
13 amount of \$9,350 incurred in connection with the Motion are entered
14 in favor of Moog against the Individual Defendants and their counsel,
15 jointly and severally, and payable within 30 days of this Court’s order.

16
17 **IT IS SO ORDERED.**

18 Dated: _____, 2023

19 _____
20 The Honorable George H. Wu
21 United States District Court Judge
22
23
24
25
26
27
28